



REQUIREMENTS FOR GRADING TERMS ON MEAT PRODUCT LABELING

Purpose

This Instruction sets forth the correct use of grade mark terms on meat items or packaging at all marketing levels between the point of U.S. Department of Agriculture's (USDA) grading and the consumer to ensure the accuracy of grading terms on meat product labeling.

Authorities

The Agricultural Marketing Act (AMA) of 1946, 7 U.S.C. 1622; Public Law (P.L.) 272; and 7 CFR Part 54, "Meat, Prepared Meats, and Meat Products Grading and Certification." The Federal Meat Inspection Act (FMIA), 21 U.S.C 601, et seq., and 9 CFR Parts 300-500.

Policy

It is the policy of the Meat Grading and Certification (MGC) Branch to facilitate the marketing of livestock and meats by providing accurate, uniform, and timely official quality and yield grading of carcass meats. Further, the MGC Branch will ensure that product grade identification and integrity are maintained nationwide from producer to consumer.

Background

Since the early 1920's, the MGC Branch has facilitated the marketing of livestock and meat in domestic and international markets. Uniform meat grade identification provides a standardized way of communicating values between buyers and sellers and signaling consumer preferences back through marketing channels to the producer. Meat grades identify carcasses for differences in value-determining characteristics that are associated with quality and cutability of meat. For over 80 years, restaurants, hotels, hospitals, the military, and consumers have depended on the USDA to identify and maintain quality grade identity from the packer to the plate. To identify and segregate product by attributes, only official standards and policies that clearly define the procedures for determining final quality and yield grades can be used. Although grading is voluntary, once carcasses are graded, and as long as the product is marketed as graded product, the grade identity must be accurately maintained throughout distribution in the market place. This ensures that the ultimate consumer can rely on the grade identity to make informed purchasing decisions.

The Food Safety Inspection Service (FSIS) has the primary responsibility to ensure labeling for meat products is truthful and not misleading. The FMIA defines labeling as all labels upon any product or any of its containers or wrappers or any other written, printed, or graphic matter accompanying the product. The FSIS Labeling and Consumer Protection Staff conducts the USDA Prior Label Approval Program to evaluate and approve the accuracy of meat product labeling including labels bearing grading terms. Relative to the use of grade labeling terms, FSIS applies Agricultural Marketing Service (AMS) requirements.

Eligibility for Grade Labeling

Species of livestock that are eligible for official USDA grading include beef, veal, calf, lamb, and pork. Quality grades such as Prime, Choice, and Select, reflect the palatability of meat. The yield grades (1 through 5) identify carcasses according to the amount of usable lean meat. Carcasses may be quality graded, yield graded, or both, as set forth in the applicable official USDA standards. The official grade terms by species are as follows:

Beef:

Quality Grades – Prime, Choice, Select, Standard, Commercial, Utility, Cutter, and Canner.

Yield Grades – Yield Grade 1, Yield Grade 2, Yield Grade 3, Yield Grade 4, and Yield Grade 5.

Lamb:

Quality Grades – Prime, Choice, Good, Utility, and Cull.

Yield Grades – Yield Grade 1, Yield Grade 2, Yield Grade 3, Yield Grade 4, and Yield Grade 5.

Veal/Calf:

Quality Grades Only – Prime, Choice, Good, Standard, and Utility.

Pork:

U.S. No. 1, U.S. No. 2, U.S. No. 3, U.S. No. 4, and U.S. Utility.

Maintaining Grade Identity and Certified Schedule Program (CSP) Identity

As long as an officially graded product is marketed using grade references, the grade identity of the product must be accurately maintained. Each link in the market infrastructure must take appropriate measures to ensure that grading terms used on labels are accurate, and that grade and other certified marketing claims can be substantiated using routine audit methods.

- I. Maintaining a Grade Identity and a Certified Schedule Program Identity at the Point of Initial Processing – Every officially inspected establishment that processes carcasses into vacuum packaged cuts will:
 - A. Develop and submit to FSIS and the AMS, MGC Branch Staff, a written quality system to maintain grade and CSP identity throughout the grading, fabrication, packaging, packing, and storage processes. It is suggested that firms coordinate the development of the quality system with their local MGC Branch supervisor or FSIS inspector. Both FSIS and AMS will review and concur on program approval/disapproval.
 - B. Amendments to the approved quality system must be identified to the MGC Branch and FSIS, and approved in advance of implementation.
 - C. Establishments with approved quality systems will be reviewed or audited in accordance with regulations and applicable MGC Instruction 108, Misuse and Misrepresentation of USDA Grade Names.
- II. In-Plant Controls—during processing, grade identity must be maintained by: (1) pre-printed **grade or** grade shield on the protective covering; (2) in-line printing, thermal transfer printing, spray printing, etc. (the **grade or** grade shield on protective coverings at packaging); (3) grade shield inserts i.e., rice paper, parchment paper, or any other FSIS approved material, prior to the closure of protective coverings; or (4) MGC Branch employee surveillance during fabrication and packaging. **Products that are multi-packed (packaged more than one per piece protective covering) may be placed in unlabeled protective coverings, provided the containers are labeled with an individual grade (i.e., USDA Prime, USDA Choice, or USDA Select).** CSP identity on protective coverings can be used in addition to **grade or** grade shield identity. For the purposes of this Instruction, the protective covering is the packing material in which the meat product is directly enclosed (generally vacuum packaged bags) and the container is the box or shipping case into which product in protective covering is placed.
 - A. Roller branding is used to maintain carcass grade identity when carcasses, sides, quarters or wholesale cuts are shipped out of the plant where grading occurred. The appropriate roller brand will be applied parallel to the length of the carcass to the round, sirloin, loin, rib, and chuck. At all times, at least two legible grade marks will be present on each of these cuts.
 - B. Roller brands or preliminary identification marks are no longer required once grade labeled protective coverings, inserts, or USDA meat grading surveillance are used.
 - C. Federal establishments with approved grade labeling programs may ship carcasses to other production or processing facilities within their corporate structure, without a rollerbrand using preliminary identification marks applied by a USDA meat grader, provided the receiving facility has an MGC Branch approved quality system for grade labeling.
 - D. Carcasses or cuts shipped to firms or facilities outside the corporate structure of the firm where grading or certification occurred must be roller branded or otherwise have the grade identity maintained in accordance with MGC Instruction 500, Beef, Bullock, and Bull Grading Methods and Procedures.
 - E. Carcasses accepted as meeting the requirements of a CSP may be used in other

CSPs provided all program requirements are met and appropriate control measures are in place. For example, carcasses certified for CSP identity may be used in other CSPs with the same or less restrictive requirements.

- F. Animals identified at the time of slaughter as meeting the live animal requirements of a CSP that later fail to meet carcass requirements or are voluntarily withdrawn from the CSP are not eligible for any other commercial branded programs based solely upon identification of the live animal criteria for a USDA certified program. However, such carcasses may be used for commercial branded programs provided they are separately identified in accordance with an approved FSIS labeling program.
- G. All CSPs must have the written acceptance of FSIS Labeling and Consumer Protection Staff.

III. Grade and CSP Labeling Controls for Packaged Meat Products

A. Prior to Retail

1. The correct labeling on the protective coverings or inserts must be applied at time of packaging and specific to one grade or CSP. The **labeled grade or grade shield** must accurately reflect the grade and/or CSP of the product (i.e., USDA Choice product must be placed in protective coverings labeled as USDA Choice or packaged with USDA Choice inserts). **Products that are multi-packed (packaged more than one per piece protective covering) may be placed in unlabeled protective coverings, provided the containers are labeled with an individual grade (i.e., USDA Prime, USDA Choice, or USDA Select).** Multiple grade or “or higher” labeling is not permissible on protective packaging materials or inserts. Other methods of grade and/or CSP labeling on protective coverings that include permanent and/or tamper evident capabilities will be considered on a case by case basis. If approved, it must be included in the plant's written in-house control program.
2. Shipping containers of product may not be grade labeled without the use of grade or CSP labeled protective coverings, grade label inserts, or USDA meat grading employee surveillance during packaging. Combos and shipping containers of product without grade or CSP labeled protective coverings, inserts, etc., may be grade labeled with the same grade as what appears on the protective coverings or grade labeled inserts of individual whole muscle cuts being produced at the same time. Shipping containers of product in plain (clear) protective coverings, **which are multi-packed or** produced during USDA meat grading surveillance, must be appropriately identified.

Pressure sensitive stickers are not permitted on protective coverings in lieu of a pre-printed grade or grade insert in protective coverings to indicate USDA grades. Pressure sensitive stickers may be used on shipping containers provided the product inside has grade labeled protective coverings or grade labeled inserts inside the protective coverings.

3. **To facilitate processing grade changes, a very limited number of protective coverings (with multiple cuts) or containers may contain like products of a higher grade provided the protective coverings and**

containers are grade labeled in accordance with this Instruction.

4. Check-off boxes are not permitted to indicate USDA grades.
5. Hand-written grade or CSP information is not permissible on protective coverings or shipping containers. Hand written quality assurance tags or other hand written labels may be used for grade control within combos or bins.
6. Use of abbreviations to express USDA quality or yield grades or CSPs is not permissible (i.e., C, CH, CHO, AA, AAA, Y, YG, or G20).
7. Labeling of grades on species that are not officially graded is not permitted (e.g., USDA Choice pork, US Choice pork, Choice pork, Sam's prime Pork, etc.) without specific, prior approval from FSIS and AMS. However official grade names may be used for non-graded species products provided they are preceded by a company name or logo and are not otherwise misleading. That is, the official grade term cannot be referenced with US, USDA, enclosed in or near a shield, or otherwise be misleading.
8. Multiple grade "or higher" labeling is permissible on shipping containers provided the labeling is accurate and the protective covering of the individual muscle cuts are grade or CSP labeled in accordance with an MGC Branch approved quality system and this instruction. Multiple grade "or higher" labeling is not permitted on bulk packed products without individual grade or CSP labeling.
9. In lieu of grade designations on protective coverings, the approved CSP name and the phrase, "USDA Certified Program" may be pre-printed on the protective covering, or on an insert inside the protective covering; however, if USDA grades are not maintained with the CSP claim, they cannot be added later or claimed in marketing the CSP products.
10. Yield grade labeling must indicate all yield grades within the shipping container (i.e., Yield Grade 1, 2, 3). The use of "or better" or "or higher" labeling is not permitted for yield grade labeling.

B. Retail and Food Service Items

1. When official grade names are used as part of a single ingredient product label or on marketing materials (even if the label, logo, or claim is a registered trademark) for products subjected to further processing to enhance palatability, tenderness (injected, marinated, basted, or tumbled), yield, etc., official grade names may be used as part of a logo or claim provided the product's protective covering and immediate container are labeled in accordance with this Instruction and the actual grade of the product and use of the logo or claim is not misleading. For example, a fresh or closely trimmed, solution-enhanced beef cut that is derived from a carcass that is officially graded USDA Select may be marketed under a "Nation's Choice" marketing program, logo, or claim provided the protective covering and shipping containers are correctly labeled for grade (i.e., USDA Select).
2. The use of official grade terms in labels, logos, or claims to market fully-

cooked, processed, and/or uncooked pre-packaged meat and non-meat items is permissible provided the label, logo, or claim is not misleading or does not reference official USDA grades in any manner. For example, a low-calorie, frozen tray-pack meat and vegetable meal may be marketed as “Lean-Choice” provided there are no references to official USDA grading.

3. If grade or CSP label claims are made on ground, diced, or comminuted meat products, ***an internal quality system must be in place to assure the meat raw material sources and the manufacturing process ensures that grade or CSP labels or claims are accurate. The use of “or higher” quality grade labels is permissible for ground, diced, or comminuted meat products.***
4. Retail grade or CSP label claims must be the same as those on the protective covering or grade labeled insert if a specific grade term is carried forward. Multiple grade claims such as USDA Choice or Higher may not be made unless all cuts inside the container are individually labeled as Prime or Choice. Graded products may not be downgraded, i.e., boxes labeled as Choice may not contain Prime graded product.
5. Official grade nomenclatures may be preceded by possessive names provided the retail or food service item is derived from graded product of the same official grade on a single ingredient item, (i.e., ABC’s Choice Ribeye Steak must be derived from a carcass graded USDA Choice).
6. Cooked beef items identified as “Beef Prime Rib” or “Prime Rib of Beef” are not required to be derived from carcasses graded USDA Prime.
7. The use of the term “Chef’s Prime” on pork may only be cited parenthetically on pork loin boneless blade roasts or pork loin boneless blade chops prepared as set forth in the Uniform Retail Meat Identity Standards for these items.
8. If retail or food service firms make claims such as “USDA Prime Only” or “Only USDA Choice Served Here”, the claim must be accurate and verifiable.

Use of Non-Domestic Grade Terms

When officially graded product from another country is marketed using that country’s grade names, the grade identity of the imported product must be accurately maintained and clearly identified with the name of the country. Each link in the market infrastructure must take appropriate measures to ensure that non-domestic grade terms used on labeling are accurate, and that grade and other certified marketing claims can be substantiated using routine audit methods. For example, the Canadian beef grading system uses Canada Prime; Canada Choice or Canada AAA; and Canada AA grade labels for beef exports to the United States. Since the Canadian grades are not equivalent to the comparable USDA grades, the grades are not interchangeable. Accordingly, products labeled with Canadian grades must be clearly identified as “Canadian Prime” or “Canadian Choice.”

equal opportunity provider and employer.